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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

EVELYN JONES,

Plaintiffs,

vs.

EQUIFAX INFORMATION SERVICES LLC, ET  
AL.

Defendants.

Case No.: 2:21-cv-02080-RFB-BNW

**JOINT MOTION TO EXTEND  
DEFENDANT WYNDHAM  
CONSUMER FINANCE, INC.'S  
DEADLINE TO RESPOND TO  
COMPLAINT**

**[THIRD REQUEST]**

Defendant, Wyndham Consumer Finance, Inc. (“Wyndham”), by and through its counsel, Armstrong Teasdale LLP, and Plaintiff Evelyn Jones, (“Plaintiff”), by and through her counsel, Kind Law and Freedom Law Firm, hereby submit this Joint Motion requesting that this Court extend the deadline for Wyndham to answer or otherwise respond to the Complaint by another thirty (30) days, or from February 18, 2022, to March 21, 2022. This is the third request to extend this particular deadline.

On November 20, 2021, Plaintiff filed a Complaint against Wyndham among others asserting a claim for violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681. (ECF No. 1). Wyndham was served with the Summons and Complaint on November 30, 2021. On December 15, 2021, and again on January 19, 2022, this Court approved 30-day extensions for Wyndham to respond to the Complaint, thereby making Wyndham’s current deadline to answer or otherwise respond to the Complaint February 18, 2022. (ECF Nos. 13; 41).

Good cause exists to extend the deadline for Wyndham to respond to the Complaint by another 30 days, or to March 21, 2022. Despite Wyndham’s diligence to date, Wyndham’s

investigation into the allegations of the Complaint is ongoing, including requesting certain documents from Plaintiff and other parties related to Plaintiff's identity and the alleged credit reporting and dispute. This information is critical for Wyndham to properly respond to the Complaint, and therefore, Wyndham requires additional time. In addition, Wyndham and Plaintiff continue to discuss a potential resolution of this action that would moot the need for Wyndham to file a response to the Complaint. For these reasons, Wyndham respectfully requests more time to respond to the Complaint. Plaintiff does not object to another 30-day extension of the response deadline. The parties believe that this third extension will not unduly delay proceedings as this case is still in its infancy, and the Scheduling Order was only recently entered on January 28, 2022. (ECF No. 44.) This joint motion is made in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court enter an order extending Wyndham's deadline to answer or otherwise respond to the Complaint by 30 days, or to March 21, 2022.

DATED this 16th day of February, 2022.

DATED this 16th day of February, 2022.

**KIND LAW**

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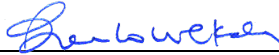
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**ORDER**

**IT IS SO ORDERED.**

  
 UNITED STATES MAGISTRATE JUDGE  
 DATED:    February 17, 2022